

Code:	SR/11/2024	
Ref. No.:	UTB/24/007767	
Type of document:	INTERNAL	
Category:	RECTOR'S DIRECTIVE	
Title:	<b>Amendment No. 2 to Rector's Directive No. 9/2018 – Protection and Processing of Personal Data</b>	
Liability:	Tomas Bata University in Zlín	
Issue date:	2 May 2024	Version: 1
Effective from:	2 May 2024	
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Prepared by:	Legal Services	
In cooperation with:	Data Protection Officer	
Pages:	10	
Appendices:	1	
Distribution list:	TBU employees	
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**PART ONE**  
**Introduction**

This Amendment shall amend Rector's Directive No. 9/2018 – Protection and Processing of Personal Data, in the full version.

**PART TWO**  
**Specification of alteration**

- (1) Appendix No. 1 – Categorization of the Areas of Processing of Personal Data at TBU shall be amended.
- (2) Other provisions of the Rector's Directive No. 9/2018, in the full version, shall continue in full force and effect.

## Appendix No. 1

### Categorization of the Areas of Processing of Personal Data at TBU

#### **Overview of the main categories**

1. Management, self-management and operation of TBU
2. Property surveillance, security
3. Educational activity
4. Scientific, research and development activity
5. Artistic creation and other creative activity
6. Habilitation and professorial appointment procedures
7. Information and promotional activity
8. Provision of public services
9. Commercial activity
10. Volunteer activity

#### **Characterization of categories**

##### **1. Management, self-management and operation of TBU**

- management of the institution
- performance of self-management
  - Board of Governors, scientific/artistic board, academic senates
- human resources management
- financial management
- property management
- public tenders
- operational services
  - library services
  - publishing services
  - support of persons with special needs
  - data and communication services, telephony
  - other
- administration activities
- contracts and contractual relations

##### **2. Property surveillance, security**

- camera systems, access systems
- network operation monitoring
- crisis information system
- records from information and application systems
- processing of security incidents

##### **3. Educational activity**

- higher education (accredited degree programmes)

- Lifelong Learning
- other educational activity
  - courses, paid education
- admission procedure
- accreditation
- student registry
- scholarships
- tuition fees
- international exchange programmes for students and staff
- practical training of students
- practical training of secondary school students
- academic and educational awards
- disciplinary procedure
- academic qualification theses

**4. Scientific, research and development activity**

- registration of projects
- publishing, institutional repository
- intellectual property and technology transfer
- conferences
- projects and research data
- contract research
- research and development cooperation
- honorary scientific degrees, medals and awards

**5. Artistic creation and other creative activity**

- honorary scientific degrees, medals and awards
- other

**6. Habilitation and professorial appointment procedures**

- habilitation procedures
- professorial appointment procedures

**7. Information and promotional activity**

- institutional websites
- marketing and promotion
- internal electronic bulletin for staff and students
- alumni

**8. Provision of public services**

- organization of public events
- cooperation with state and non-profit sector

**9. Commercial activity**

- selling of books, TBU promotional items
- accommodation and catering services
- counselling and expert services
- popular-science activities for children
- other commercial activities

**10. Volunteer activity**

- provision and organization of volunteer activity

## **Personal data categories**

### **Overview**

1. Address and identification data
2. Sensitive data (specific category of personal data)
3. Descriptive data
4. Study-related data
5. Economic data
6. Personal data in the employment context
7. Operational and location data
8. Data about activities carried out by the subject
9. Data about another person
10. Other

### **Characterization of categories**

#### **1. Address and identification data**

Name, surname, date and place of birth, civil status, birth registration number, academic degree, nationality, address (including electronic), data box ID, telephone number, identification card number, digital identifier, signature, etc.

#### **2. Sensitive data (specific category of personal data)**

- national, racial or ethnic origin  
[data about nationality is not a sensitive data]
- membership of trade union organizations
- conviction of a crime  
[extract from the Criminal Register evidencing clean criminal record is not a sensitive data]
- health status  
[a confirmation issued by a doctor or a health care facility (e.g. during a pre-employment occupational health check or preventive medical check-up) stating whether an employee is able or unable to perform his/her work is not a sensitive data referring to one's health status]
- sexual orientation
- biometric data  
[Biometric data do not refer to data about height, weight, colour of the eyes, clothing sizes or proportions of the data subject, etc., because these data do not allow direct identification or authentication of the data subject].

[Using a simple camera system is not considered as processing of biometric data. It would be considered as processing of biometric data only in the event that some biometric characteristics of the data subjects (human face identification system, biometric characteristics of gait, etc.) would be compared.]

#### **3. Descriptive data**

Education, knowledge of foreign languages, professional qualification, knowledge and skills,

number of children, portrait photo, video/audio recording of a person, military service, previous employment, medical insurance company, membership of interest groups, certificate of no criminal record, etc.

4. **Study-related data**

Records on studies and study-related activities, academic performance, academic awards, etc.

5. **Economic data**

Bank details, bank cards, salary, premium, fees, liabilities and claims, orders, purchases, economic situation, ownership and property, taxes, etc.

6. **Personal data in the employment context**

Records on work performance and work-related activities, employer, constituent part, job title and position, work performance assessment, awards for work performance and penalties, etc.

7. **Operational and location data**

Typically data from electronic systems related to a particular data subject – e.g. data about the usage of information systems, about data traffic and electronic communication, about the usage of telephone, about access to various areas, recording from camera systems, etc.

8. **Data about activities carried out by the subject**

Publishing, data about professional activities, participation in conferences, involvement in projects, data about business trip or study periods, etc.

9. **Data about another person**

Address and identification data of a family member, husband/wife, child, partner, etc.

10. **Other data**

Please specify.

## **Data subject categories**

### **Overview**

1. Employees
2. Students
3. Persons with special needs
4. Alumni
5. Applicants (for studies, for employment)
6. Children
7. Secondary school students
8. Customers
9. Participants in research
10. Supervisors, co-investigators, co-authors, authors
11. Visitors and attendees to events
12. Parties to the administrative procedure
13. Other persons

### **Characterization of categories**

1. **Employees**  
Persons in labour-law relation to the institution/controller (including subcontractors/contractors – external staff), exchange staff/staff participating in traineeships etc.
2. **Students**  
Students in all modes of study at the given institution (including U3A and other), exchange students, etc.
3. **Persons with special needs**  
Physically disadvantaged persons (students, employees, clients, visitors).
4. **Alumni**  
Alumni who have graduated in all modes of study at the given institution, educational courses, training, traineeships, etc.
5. **Applicants**  
Applicants for studies, applicants for employment, participants in selection procedures and invitations to a tender.
6. **Children**  
Children under 15 years of age [age limit in accordance with the national regulation governing the protection of personal data of children] (e.g. attendees to the Junior University or other events organized by the institution).
7. **Secondary school students**  
Students provided with practical training at TBU component parts.

**8. Customers**

Natural persons with commercial relation to the institution (e-shop customers, attendees to paid courses and events, external library users, clients using the services provided – external diners, guests using accommodation facility, etc.).

**9. Participants in research**

Persons participating in a research carried out by the controller and having the role of the subjects surveyed or respondents.

**10. Supervisors, co-investigators, co-authors**

Persons who have no labour-law relation to the controller and who participate in educational or research activities of the controller performing the role of external supervisors, consultants, project co-investigators, co-authors of publications, authors of separate and independent copyright works, etc.

**11. Visitors and attendees to events**

Persons participating in events organized by the controller on a non-commercial basis (open days, excursions, seminars, training, conferences, social events) or visiting the controller for different purposes (visits, inspections, etc.).

**12. Parties to administrative proceedings**

Persons participating in administrative proceedings in relation to the controller, parties in a lawsuit, complainant, applicants for access to information in accordance with the Act on Free Access to Information, etc.

**13. Other persons**

Persons affected by a report filed under the Whistleblower Protection Act, the Conflict of Interest Act, etc.

## **Lawfulness of Processing of PD**

Processing shall be lawful only if, and to the corresponding extent, at least one of the following conditions is applicable:

### **Overview**

1. By operation of law
2. Consent of the data subject
3. Performance of a contract
4. Interest of the data subject
5. Interest of the controller
6. Public interest

### **Characterization of categories**

1. **By operation of law**

Processing is necessary for the discharge on a legal obligation to which the controller is subject.

2. **Consent of the data subject**

The data subject has given consent to the processing of his/her personal data for one or more specific purposes.

3. **Performance of a contract**

Processing is necessary for the negotiation of conclusion or performance of a contract to which the data subject is party or in order to take steps **at the request of** the data subject prior to entering into a contract.

4. **Interest of the data subject**

Processing is necessary in order to protect the vital interests of the data subject or of another natural person.

5. **Interest of the controller**

Processing is necessary for the purposes of the legitimate interests pursued by the controller or a third party.

6. **Public interest**

Processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child.

**Types of processing of personal data – examples**

- manual – by own employees
- manual – by processor
- automated – by means of own systems
- automated – by processor
- camera systems
- biometric systems
- other type of processing – please specify

Document version			
Date	Version	Changed	Description of change
2 May 2024	01	Legal Services	Appendix No. 1 Updating regarding personal data processing